

ADMINISTRATIVE RECORD INDEX

for the

T. H. AGRICULTURE & NUTRITION CO INC (OP UNIT 1) NPL Site

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1.8 Preliminary Assessment Documents

- 0001-1. Preliminary Assessment, T H Agriculture & Nutrition Company Site, Form, EPA Region IV (May 3, 1984).

1.9 Site Inspection Documents

- 0006-1. "Site Investigation Report, T H Agriculture & Nutrition Company, GA042101261," Thomas Westbrook, State of Georgia Department of Natural Resources, for EPA Region IV. (August 1985).

3.0 REMEDIAL INVESTIGATION (RI)

3.2 Sampling and Analysis Data

- 0054-1. "Preliminary Site Characterization Summary Technical Memorandum," Woodward-Clyde Consultants, Prepared for T H Agriculture and Nutrition Company. (April 1991).
- 0145-2. Field Work Report, Sampling and Analysis of Water and Sediments in Three Ponds, Environsoft. (January 11, 1993).
- 0156-3. Letter from Elio Arniella, Environsoft, to Alan Yarbrough, EPA Region IV transmitting "Sampling Three Ponds in the Vicinity of the THAN Site in Albany Georgia." (March 9, 1993).

3.3 Scopes of Work

1. Cross-Reference: In the Matter of the T H Agriculture & Nutrition Co., Inc. Site, Administrative Order by Consent for Remedial Investigation/Feasibility Study, T H Agriculture & Nutrition Co., Inc., Respondent. (July 6, 1990). [Filed and cited as entry number 1 in 10.11 ENFORCEMENT - EPA Administrative Orders]

3.4 Work Plans and Progress Reports (cont'd.)

- 0189-1. "Remedial Investigation/Feasibility Study Work Plan for T H Agriculture & Nutrition Company, Site, Albany, Georgia," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company, Inc. (November 13, 1990).

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- 0416-2. "Remedial Investigation/Feasibility Study Work Plan Amendments, T H Agriculture & Nutrition Company Site," Woodward-Clyde Consultants, Prepared for T H Agriculture and Nutrition Company. (July 1991).

3.8 Interim Deliverables

- 0446-1. "Health and Safety Plan for T H Agriculture & Nutrition Company, Inc. Site in Albany, Georgia," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (November 13, 1990).
- 0521-2. "Field Sampling and Analysis Plan, T H Agriculture & Nutrition Company Facility, Albany, Georgia," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (November 13, 1990).
- 0599-3. "Quality Assurance Project Plan of the Sampling and Analysis, T H Agriculture & Nutrition Company Facility, Albany, Georgia," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. [Note: Due to their CONFIDENTIAL nature portions of this document have been withheld. Withheld material is available, for Judicial review only, at EPA Region IV, Atlanta, Georgia] (November 13, 1990).

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3.10 Remedial Investigation (RI) Reports

- 1122-1. "Preliminary Remedial Investigation Report, T H Agriculture & Nutrition Company Facility, Albany, Georgia," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (April 25, 1990).
- 1316-2. "Preliminary Remedial Investigation Report, T H Agriculture & Nutrition Company Facility, Albany, Georgia, Part II," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (April 25, 1990).

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- 1368-3. "Final Remedial Investigation Study for T. H. Agriculture & Nutrition Company." Appendices dated December 1991 are final (February 1992).

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VOL.12 3.11 Health Assessments

- 0001-1. "Preliminary Health Assessment for T H Agriculture & Nutrition Company, Inc. (Albany Plant), Cerclis No. GAD042101261, Albany, Dougherty County, Georgia," Agency for Toxic Substances and Disease Registry (ATSDR). (June 20, 1990).

3.12 Endangerment Assessments

- 0012-1. "Technical Memorandum: Exposure Assessment and Documentation, T H Agriculture & Nutrition Co. Site," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (June 1991).
- 0046-2. "Technical Memorandum: Contaminant Identification and Documentation, T H Agriculture & Nutrition Co. Site," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (June 1991).
- 0103-3. "Technical Memorandum: Environmental Evaluation," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company, Inc. (June 1991).
- 0129-4. "Technical Memorandum: Industrial Use Scenario for the THAN- Albany, Georgia Facility," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (November 1991).
- 0172-5. Memorandum from Alan Yarbrough, to John P. Cleary, T H Agriculture & Nutrition Company, Inc. (November 27, 1991). Concerning comments on the "Industrial Use Scenario" for the THAN Site, Albany, Georgia.

4.0 FEASIBILITY STUDY (FS)

4.2 Sampling and Analysis Data (cont'd.)

1. Cross-Reference: Letter from Bretton C. Overholtzer and Dennis Y. Takade, Woodward-Clyde, to Alan Yarbrough, EPA Region IV (July 20, 1992). Concerning summary of the methodology used in the study of subsurface soils at the T H Agriculture & Nutrition Company, Inc. site in Albany, Georgia. [Filed and cited as entry number 2 in 10.11 ENFORCEMENT - EPA Administrative Orders]

4.4 Work Plans and Progress Reports

- 0180-1. "Treatability Study Work Plan, Phase I, Pilot Extraction/Pumping Test, T H Agriculture & Nutrition Co. Site," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (October 1991).

4.7 Applicable or Relevant and Appropriate Requirements (ARARs)

- 0217-1. "Rules for Underground Injection Control, Chapter 391-3-6," State of Georgia Department of Natural Resources (Revised). (September 17, 1984).
- 0230-2. "Drinking Water Regulations and Health Advisories, U.S. Environmental Protection Agency. (April 1992).

4.8 Interim Deliverables

- 0244-1. "Technical Memorandum: Candidate Technologies Identification, T H Agriculture Co. Site," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (August 1991).
- 0279-2. "Technical Memorandum: Remedial Technologies, Alternatives, and Screening, T H Agriculture & Nutrition Co. Site," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company. (December 1991).

4.9 Feasibility Study (FS) Reports

- VOL 13 0368-1. "Feasibility Study Report, T H Agriculture & Nutrition Company, Inc., Albany, Georgia," Woodward-Clyde Consultants, Prepared for T H Agriculture & Nutrition Company, Inc. (June 1992).

4.9 Feasibility Study (FS) Reports (cont'd.)

2. Cross-Reference: Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Alan Yarbrough, EPA Region IV (June 16, 1992). Concerning comments on the Feasibility Study Report, Remedial Investigation, and the draft Record of Decision. [Filed and cited as entry number 2 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]

4.10 Proposed Plans for Selected Remedial Action

1. Cross-Reference: Letter from Alan Yarbrough EPA Region IV, to Susan Eason, State of Georgia Department of Natural Resources. (June 9, 1992). Concerning transmittal of draft copies of the proposed plan and Record of Decision for review. [Filed and cited as entry number 1 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]
2. Cross-Reference: Memorandum from Kevin Koporec, EPA Region IV, to Alan Yarbrough, EPA Region IV. (June 17, 1992). Concerning comments on the draft Record of Decision and draft Proposed Plan. [Filed and cited as entry number 3 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]
3. Cross-Reference: Memorandum from Jonathan Vail, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV (June 18, 1992). Concerning comments on the draft Record of Decision and draft Proposed Plan. [Filed and cited as entry number 4 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)]
- 0644-4. Letter from Bill Mundy, State of Georgia Department of Natural Resources, to Alan Yarbrough, EPA Region IV. (July 29, 1992). Concerning comments on the Proposed Plan/Feasibility Study Report for the T H Agriculture & Nutrition Company, Inc. Site.
- 0647-5. "Superfund Proposed Plan Fact Sheet, T H Agriculture and Nutrition Site, Albany, Dougherty County, Georgia," EPA Region IV (September 1992). Concerning the announcement of the Proposed Plan and the Public Comment Period.

4.10 Proposed Plans for Selected Remedial Action
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- 0662-6. Letter from Edwin Williamson, Hunton & Williams, for T H Agriculture & Nutrition Company, Inc., to Paul Schwartz, EPA Region IV. (September 30, 1992). Concerning a request for an extension to the Public Comment Period for the T H Agriculture & Nutrition Company, Inc. Site.
- 0664-7. Letter from Barbara Sullivan, Albany State College, to Alan Yarbrough, EPA Region IV. (September 30, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0668-8. Letter from Betty Henson, Private Citizen, to Alan Yarbrough, EPA Region IV. (October 29, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0671-9. Letter from Don McHugh, State of Georgia Department of Natural Resources, to Alan Yarbrough. (October 30, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0674-10. Letter from Paul Keenan, Mayor, City of Albany, to Alan Yarbrough, EPA Region IV.0 (November 9, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0677-11. Letter from Dennis Radocha, Boise Cascade Corp., to Betty Winter, EPA Region IV. (November 12, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0688-12. Letter from Lamar Hudgins, a Private Citizen, to Alan Yarbrough, EPA Region IV. (November 12, 1992). Concerning a request to reopen the comment period for the Proposed Plan for the T H Agriculture & Nutrition Company, Inc., Site.
- 0690-13. Letter from Cynthia McDevitt, Air Products, to Alan Yarbrough, EPA Region IV (November 12, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.

4.10 Proposed Plans for Selected Remedial Action
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- 0694-14. Letter from John Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV (November 13, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0710-15. Letter from James Stokes and Donald Cloud, Alston & Bird, for Gold Kist, Inc., to Betty Winter, EPA Region IV. (November 13, 1992). Concerning comments on the Proposed Plan for the T H Agriculture & Nutrition Company, Inc. Site.
- 0718-16. Letter from Alan Yarbrough, EPA Region IV, to Paul Keenan, Mayor, City of Albany. (November 17, 1992). Concerning a response to a letter dated 11/9/92.
- 0722-17. Letter from Roy Lane, City of Albany, to Alan Yarbrough, EPA Region IV. (February 4, 1993). Concerning a request that EPA Region IV extend their investigation to include retention Ponds near the THAN Site.
- 0725-18. Letter from Citizens for a Healthy Environment, Economy and Resources (CHEER), to Patrick Tobin, EPA Region IV. (February 5, 1993). Concerning a request for a delay in issuing the Record of Decision (ROD).
- 0728-19. Note from John Cleary, T H Agriculture and Nutrition Company, Inc, to Alan Yarbrough, EPA Region IV. (February 18, 1993). Concerning statements made at the Public Meeting about the nature of ponds near the THAN Site.
- 0730-20. Memorandum from Steven Kinsler and Lynn Wilder, Agency for Toxic Substances and Disease Registry (ATSDR), to Robert Safay, Agency for Toxic Substances and Disease Registry (ATSDR). (February 25, 1993). Concerning a Health review of the Selected Remedial Alternative for the T H Agriculture & Nutrition Company, Inc. Site.
- 0738-21. Facsimile from John Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV. Attached is a letter from Woodward-Clyde to John Cleary concerning Clean up Levels at the THAN Site. (March 18, 1993).

5.0 RECORD OF DECISION (ROD)

5.9 Record of Decision (ROD) (cont'd.)

- 0749- 1. Letter from Alan Yarbrough EPA Region IV, to Susan Eason, State of Georgia Department of Natural Resources. (June 9, 1992). Concerning transmittal of draft copies of the proposed plan and Record of Decision for review.
- 0751- 2. Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Alan Yarbrough, EPA Region IV (June 16, 1992). Concerning comments on the Feasibility Study Report, Remedial Investigation, and the draft Record of Decision.
- 0754- 3. Memorandum from Kevin Koporec, EPA Region IV, to Alan Yarbrough, EPA Region IV. (June 17, 1992). Concerning comments on the draft Record of Decision and draft Proposed Plan.
- 0758- 4. Memorandum from Jonathan Vail, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV (June 18, 1992). Concerning comments on the draft Record of Decision and draft Proposed Plan.
- 0760- 5. Memorandum from Winston Smith, EPA Region IV, to Joseph Franzmathes, EPA Region IV. (July 6, 1992). Concerning comments on the draft Record of Decision.
- 0762- 6. Letter from Alan Yarbrough EPA Region IV, to Susan Eason, State of Georgia Department of Natural Resources. (March 3, 1993). Concerning transmittal of a draft of the Record of Decision for review.
- 0764- 7. Letter from Bill Mundy, State of Georgia Department of Natural Resources, to Alan Yarbrough, EPA Region IV. (March 17, 1993). Concerning a review of the Draft Record of Decision.
- 0768- 8. Letter from Alan Yarbrough, EPA Region IV, to Susan Eason, State of Georgia Department of Natural Resources. (March 31, 1993). Concerning request for comments on the draft Record of Decision.

5.0 RECORD OF DECISION (ROD)

5.9 Record of Decision (ROD) (cont'd.)

- 0771- 9. Letter from Alan Yarbrough, EPA Region IV, to Susan Eason, State of Georgia Department of Natural Resources. (April 7, 1993). Concerning request for comments on the revised draft Record of Decision which includes changes discussed in the April 7, 1993 meeting between EPA Region IV and State of Georgia Department of Natural Resources.
- 0773-10. Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), Alan Yarbrough, EPA Region IV. (May 4, 1993). Concerning review of the 'Record of Decision for the T H Agriculture & Nutrition Site.
- 0776-11. Letter from Alan Yarbrough, EPA Region IV, to Susan Eason, State of Georgia Department of Natural Resources. (May 12, 1993). Concerning request for concurrence or nonconcurrence with the Revised draft Record of Decision.
- 0778-12. Letter from Harold Reheis, State of Georgia Department of Natural Resources, to Richard Green, EPA Region IV. (May 17, 1993). Concerning concurrence with the Record of Decision for the T H Agriculture & Nutrition Site.
- 0780-13. "Record of Decision (ROD), T H Agriculture & Nutrition Company Site, Albany Georgia," EPA Region IV. (May 21, 1993).

9.0 STATE COORDINATION

9.1 Correspondence

1. Cross-Reference: Letter from Bill Mundy, State of Georgia Department of Natural Resources, to Alan Yarbrough, EPA Region IV. (July 29, 1992). Concerning comments on the Proposed Plan/Feasibility Study Report for the T H Agriculture & Nutrition Company, Inc. Site. [Filed and cited as entry number 4 in 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

10.0 ENFORCEMENT

10.11 EPA Administrative Orders (cont'd.)

- 0857- 1. In the Matter of the T H Agriculture & Nutrition Co., Inc. Site, Administrative Order by Consent for Remedial Investigation/Feasibility Study, T H Agriculture & Nutrition Co., Inc., Respondent. (July 6, 1990).
- 0909- 2. Letter from Bretton C. Overholtzer and Dennis Y. Takade, Woodward-Clyde, to Alan Yarbrough, EPA Region IV (July 20, 1992). Concerning summary of the methodology used in the study of subsurface soils at the T H Agriculture & Nutrition Company, Inc. site in Albany, Georgia.
- 0930- 3. Letter from James Levine, Hunton & Williams, for T H Agriculture & Nutrition, to Alan Yarbrough, EPA Region IV. (August 14, 1992). Concerning invocation of the Dispute Resolution provision of the Administrative Order by Consent.
- 0939- 4. Memorandum from Kay Wischkaemper, EPA Region IV to Alan Yarbrough, EPA Region IV. (August 27, 1992). Concerning comments on the resolution of the dispute surrounding the use of the PESTAN model.
- 0942- 5. Letter from Alan Yarbrough, EPA Region IV, to John Cleary, T H Agriculture & Nutrition. (September 1, 1992). Concerning resolution of the PESTAN vs. Summers Dispute.

11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

11.9 PRP-Specific Correspondence

- 0945- 1. General Notice Letter from Donald Guinyard, EPA Region IV, to David Keehn, attorney with Air Products and Chemicals, Inc. Notification of potential liability. (January 29, 1992).
- 0951- 2. Letter from Cindy McDevitt, Air Products and Chemicals, Inc., to Paul Schwartz, EPA Region IV. Response to 1/29/92 General Notice Letter (April 28, 1992).

11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

11.9 PRP-Specific Correspondence (cont'd.)

3. Meeting notes and Handouts, from a meeting of representatives of EPA Region IV and T H Agriculture & Nutrition Company, Inc. This document is CONFIDENTIAL. CONFIDENTIAL Documents are available for viewing for judicial review only at EPA Region IV. (August 25, 1992).

13.0 COMMUNITY RELATIONS

13.1 Correspondence

- 0957-1. Notes from a 11/9/92 meeting held by a Concerned Citizens Group. (November 11, 1992). Concerning Clean up at the T H Agriculture & Nutrition Company, Site.

13.6 Community Relations Plans

- 0966-1. "Final Community Relations Plan" for T H Agriculture & Nutrition Co. Inc. Site, Albany, Dougherty County, Georgia, Dynamac Corporation (February 1, 1991).

13.7 News Clippings and Press Releases

- 1000-1. "Georgia pesticide site studied," Newsletter Article, Superfund Week. (November 6, 1992).
- 1002-2. "Time for comment runs out on site," Newspaper Article, Albany Herald. (November 14, 1992).
- 1004-3. "Strategy Meeting tonight," Newspaper Article, Albany Herald. (November 14, 1992).
- 1006-4. "Firm to test ponds for contaminants," Newspaper Article, Albany Herald. (November 14, 1992).
- 1008-5. "Toxic site concerns residents," Newspaper Article, Albany Herald. (December 2, 1992).
- 1011-6. "DDT best known contaminant at site," Newspaper Article, Albany Herald. (December 2, 1992).
- 1013-7. "Group seeking delay from EPA," Newspaper Article, Albany Herald. (February 3, 1993).
- 1015-8. Letter from Dorothy Bailey, Private Citizen, to the Editor, People's Forum, The Albany Herald. (February 4, 1993).

13.7 News Clippings and Press Releases (cont'd.)

- 1017- 9. "Ponds unsafe, group warns," Newspaper Article, Albany Herald. (February 8, 1993).
- 1019- 10. "Albany officials to ask EPA to assess risk at old ag plant," Newspaper Article, Albany Herald. (February 8, 1993).
- 1021- 11. Untitled Newspaper Article, Albany Herald. (February 17, 1993).
- 1023- 12. "EPA Refuses Citizens' Request to Delay Cleanup at Georgia Site," Newsletter Article, Superfund Report. (March 10, 1993).

13.8 Public Meetings

- 1026- 1. "United States Environmental Protection Agency, T H Agriculture and Nutrition Site, Albany, Georgia," Public Meeting Transcript, Mervin Hardee, Court Reporter. (September 24, 1992).
- 1086- 2. Public Meeting Announcement, EPA Region IV. (February 16, 1993). Concerning a Public Meeting to be held on 2/16/93 to discuss the soil and groundwater cleanup remedies at the THAN Site.
- 1088- 3. "Letter of Intent to apply for technical assistance Grant (TAG, for T H Agriculture and Nutrition Superfund Site" (April 1993).

17.0 SITE MANAGEMENT RECORDS

17.7 Reference Documents

- 1089- 1. "Perox-Pure, Process Description," Peroxidation Systems Inc., (September 1990).